

1 DANIEL G. BOGDEN
2 United States Attorney
3
4 GREG ADDINGTON
5 Nevada State Bar No. 6875
6 Assistant United States Attorney
7 100 West Liberty Street, Suite 600
8 Reno, Nevada 89501
9 (775) 784-5438
10 (775) 784-5181 – facsimile
11 greg.addington@usdoj.gov

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 ELIZABETH R. ILAGAN,

2:16-cv-1209-APG-VCF

10 Plaintiff,

STIPULATION AND PROPOSED ORDER
TO EXTEND TIME TO FILE
STIPULATION OF DISMISSAL
(first request)

11 v.

12 ROBERT McDONALD, Secretary of Veteran's
13 Affairs, and
14 DR. BRYAN WERNER, an individual,

Defendant.

15
16 It is hereby stipulated and agreed by and between the parties to this action, through their
17 respective counsel, as follows:

18 1. The parties participated in an Early Neutral Evaluation (ENE) on November 1, 2016, at
19 which time a negotiated settlement was reached as to all claims. See Minutes of Proceedings (#20).
20
21 2. With one exception, all required elements of the negotiated settlement have been
22 concluded. The parties are awaiting completion of certain revisions to plaintiff's official personnel file.
23 That element of the negotiated settlement has been slightly delayed because of a delay in obtaining
24 access to the personnel file from archives.

3. The December 13 deadline for filing the Stipulation for Dismissal has passed; however, the parties anticipate the completion of the one remaining element of the negotiated settlement by January 27, 2017 – after which time the Stipulation for Dismissal will promptly be filed.

4. Based on the foregoing, the parties stipulate to an extension of the deadline to January 27, 2017, to file the Stipulation for Dismissal in this settled case and request approval of the extension.

CARL A. LINDSTROM, JR., ESQ.
Counsel for Plaintiff

/s/ Greg Addington
GREG ADDINGTON
Assistant United States Attorney

IT IS SO ORDERED

Date: December 19, 2016

UNITED STATES MAGISTRATE JUDGE